

PARENTI & RAFFAELLI, LTD.



ARCHITECTURAL WOODWORK, CUSTOM, CONTRACT & RESIDENTIAL FURNITURE

RECEIVED

APR 28 2004

**AIR ENFORCEMENT BRANCH,
U.S. EPA, REGION 5**

April 26, 2004

United States Environmental Protection Agency
USEPA (AE-17J)
Air & Radiation Division
77 West Chicago Boulevard
Chicago, Illinois 60604

Re: CAAPP Annual Compliance Certifications

To Whom It May Concern:

Enclosed please find the completed 2003 CAAPP Annual Compliance Certification-401 for Parenti & Raffaelli, Ltd facility located at 215 East Prospect Avenue Mount Prospect, Illinois (ID Number 031198ABT)

If there are any questions, please feel free to contact either the undersigned at 847-253-5550 or Mr. James Zimny of Mostardi Platt Environmental at 630-993-2680

Sincerely,

Ronald Parenti
Secretary and Treasurer
Parenti & Raffaelli, Ltd

Enclosures





ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
COMPLIANCE AND SYSTEMS MANAGEMENT SECTION
1021 NORTH GRAND AVENUE EAST, P O BOX 19276
SPRINGFIELD, ILLINOIS 62794-9276

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APR 28 2004

AIR ENFORCEMENT BRANCH
U.S. EPA REGION 5
FOR AGENCY USE ONLY

**CAAPP ANNUAL
COMPLIANCE CERTIFICATION**

ID NUMBER

PERMIT #

DATE

THE CLEAN AIR ACT PERMIT PROGRAM (CAAPP) REQUIRES THAT EACH CAAPP PERMIT HOLDER SUBMIT AN ANNUAL COMPLIANCE CERTIFICATION FOR ALL EMISSION UNITS AT THE SOURCE AS REQUIRED BY 40 CFR 70.6 (c) (5), 39.5 (7) (p) (v) OF THE ENVIRONMENTAL PROTECTION ACT AND CAAPP PERMIT CONDITION 9.8. THE COMPLIANCE CERTIFICATION REPORTING PERIOD IS JANUARY 1 TO DECEMBER 31 AND IS DUE ON OR BEFORE MAY 1 FOR THE PRECEDING CALENDAR YEAR. THIS CERTIFICATION FORM CAN BE USED BY FACILITIES TO SATISFY THIS REQUIREMENT.

SOURCE INFORMATION

1) SOURCE NAME Parenti & Raffaelli, Ltd.		
2) SOURCE ADDRESS 215 East Prospect Avenue		
3) CITY Mount Prospect	4) COUNTY Cook	
5) TOWNSHIP Elk Grove	6) STATE Illinois	7) ZIP CODE 60056
8) DATE FORM PREPARED 4-16-04		9) SOURCE ID NO 031198ABT
10) CAAPP PERMIT NO		
11) CALENDAR YEAR OR REPORTING PERIOD COVERED BY THIS REPORT 2003		

SOURCE COMPLIANCE INFORMATION

12) CHECK EITHER (a) OR (b) BELOW

(a) ☒ During the entire reporting period, this source was in **continuous** compliance with ALL terms and conditions contained in its CAAPP permit. The method used to determine compliance for each term and condition is the method specified in the permit.

(b) ☐ With the exception of the items identified in Table 1 and Table 2, this source was in **continuous** compliance with all terms and conditions contained in the permit. The method used to determine compliance for each term and condition is the method specified in the permit, unless otherwise indicated.

NOTE: Table 1 must be completed for all units and activities regardless of compliance status. Table 2 must be completed for all sources of intermittent or continuous noncompliance with any permit condition.

ATTACHMENTS

13) Are you submitting any attachments with this report? Yes ☐ No ☒

If yes, please list the attachments below

COMPLIANCE CERTIFICATION REPORT MAILING

14) In addition to submitting the Compliance Certification report to the Compliance and Systems Management Section (CASM), a copy of the Compliance Certification report must also be submitted to the USEPA Region 5 and the appropriate IEPA regional field office. Addresses are listed in condition 8.6 of your CAAPP permit.

Please check the appropriate boxes.

A copy of the Compliance Certification report has been submitted to USEPA

Yes ☒ No ☐

A copy of the Compliance Certification report has been submitted to the appropriate IEPA regional field office

Yes ☒ No ☐

SOURCE CONTACT PERSON

15) NAME OF TECHNICAL CONTACT PERSON FOR THIS REPORT

Debbie Wozniak

16) TECHNICAL CONTACT PERSON TITLE

17) CONTACT PERSON'S TELEPHONE NUMBER

847-253-5550

COMPLIANCE STATEMENT AND SIGNATURE BLOCK

NOTE: A RESPONSIBLE OFFICIAL MUST SIGN THIS COMPLIANCE CERTIFICATION. UNSIGNED COMPLIANCE CERTIFICATIONS WILL BE RETURNED AS INCOMPLETE.

18) I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

AUTHORIZED SIGNATURE

BY



AUTHORIZED SIGNATURE

Ronald Parenti

TYPED OR PRINTED NAME OF SIGNATORY

Secretary and Treasurer

TITLE OF SIGNATORY

4

26

04

DATE

Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions

Source Name	Parenti & Raffaelli, Ltd.	Source I.D. Number	031198ABT
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(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status "C" Continuous Intermittent Noncompliance "N"	(4) Compliance Determination Method
1 0 (all)	Source identification	C	No action required for source description
2 0	List of abbreviations	C	No action required for the list of abbreviations/acronyms
3 1	Insignificant activities and identification of insignificant activities	C	No action required for the identification list.
3 2.1	Cold cleaning degreaser	C	Station operating procedures comply with 35 IAC 215 182 procedures for cold cleaning degreasers. Operators follow the procedures at all times.
3 2.2	Particulate matter process emission unit	C	The process emission unit limitations are found in 35 IAC 212 321 for this facility (construction after April 14, 1972). Particulate emissions are insignificant based upon maximum emissions for all permitted emission units at the facility
3 2 3	Organic material emission unit	C	Organic material emission units cannot exceed 8.0 lb/hr per [IAC 218 182]. No permitted emission point exceeds this limitation.
3 3 2	Addition of insignificant activities pursuant to 201 212(a)	C	As per the condition, the facility will notify the IEPA of any additional insignificant activities from 201 212(a) at the next Title V permit renewal application. No action required at this time.
	Addition of new insignificant activities pursuant to 201 210(a) and 201 211	C	The facility will provide the IEPA with a notification of any new insignificant activities pursuant 201 210(a) and 201 211 prior to a Title V renewal, if any new applicable insignificant sources are added to the facility. There is no action at this time.
3 2/3 3	Addition of insignificant activities pursuant to 201 210(b)	C	Insignificant activities exceeded emission limits and no notification is required for additional insignificant activities pursuant to 201 210(b)
4 0	List of significant emission units	C	Section 4 0 of the Title V permit is a complete list of emission units. No action required at this time. There are no other significant emission sources at the facility
5 2	Applicable regulations for specific emission units in Section 7 (Unit Specific Conditions)	C	No action required. This requirement references unit specific regulations in Section 7 of the CAAPP permit.

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Source Name			Source I. D. Number
Parenti & Raffaelli, Ltd.			031198ABT
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
5 2 2	General applicability of fugitive dust and opacity regulations	C	<p>5 2 2(a) relates to fugitive particulate matter. As stated in the CAAPP permit, compliance with this requirement is considered to be assured by the inherent nature of facility operations and as demonstrated by historical operation.</p> <p>5 2 2(b) relates to opacity limits of 30% for all sources. The facility complies with the 30% opacity limits. Compliance is demonstrated by visual observations by operators, and corrective action would be taken if the operators noticed visible emissions. Records would only be kept if there were potential visible emissions from any of these sources.</p>
5 2 3	Ozone depleting substances	C	The facility complies with the standards for recycling and emission reduction of ozone depleting substances by not having these substances on site. Only certified contactor and required recovery equipment are used when servicing equipment subject to this requirement.
5 2 4	Risk Management Plan	C	The facility does not currently require a Risk Management Plan (RMP) and thus is in compliance with this requirement until such time that an RMP is required per the requirements of 40 CFR 68.
5 2 5(a)	Regulations under 40 CFR Parts 60, 61, 63, or 35 IAC Subtitle B	C	If the facility becomes subject to regulations under the referenced parts after the date of the permit issuance, the facility will comply with the applicable requirements by the date(s) specified, and will certify compliance with the applicable regulations as part of the annual compliance certification as required by condition 9.8. At this time, the facility has no new applicable requirements since the permit was issued.
5 2 5(b)	Non-applicability or demonstration of compliance with 5 2 5(a)	C	The facility will submit, with any permit renewal, the necessary information to address either the non-applicability or demonstrate compliance with the applicable regulations under 40 CFR parts 60, 61, 61, and 35 IAC Subtitle B. There is no action concerning this condition at this time.
5 3	Non-Applicability of regulations of concern	C	This permit is issued based upon the source not being subject to 40 CFR 63, Subpart JJ, because the source is not a major source of HAPs. No action required.

Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions

Source Name	Source: D. Number
Parenti & Raffaelli, Ltd.	031198ABT

(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous Intermittent Noncompliance N/A	(4) Compliance Determination Method
5 4	Source-wide operational and production limits not in Section 9	C	This requirement is not applicable. The facility is aware that it must meet the source-wide standard permit conditions in Section 9 of the permit.
5 5 1	Permitted emissions for fees	C	The facility complies with the annual ton/year emission limitations contained in 5 5 1 and uses these levels for payment of annual permit fees. The demonstration of compliance with the annual limits is contained in the annual emissions report.
5 5 2	Emissions of hazardous air pollutants	C	Engineering calculations based on the use of appropriate emission factors demonstrated that the facility was not a major source of HAP emissions. Therefore, there are no specific HAP limits for the facility.
5 5 3	Other source-wide emission limitations	C	No limits were set for other source-wide emission sources. Unit specific emission limitations occur in Section 7 of the air permit.
5 6 1	Emission records	C	The facility maintains records of the total annual emissions on a calendar year basis as required by this condition. The records are kept for the emission units in Section 7 of the CAAPP permit.
5 6 2	Retention and availability of records	C	All records and logs required by the CAAPP permit will be retained for at least five years. The facility will retrieve and print, during normal office hours, any records retained in an electronic format in response to an IEPA or USEPA request for records.
5 7 1	General source-wide reporting requirements	C	The facility will promptly notify the IEPA compliance section of deviations of the source with the permit requirements. The reports will describe the probable cause of such deviations, and any corrective actions or preventative measures taken. During calendar year 2003, there have been no deviations requiring IEPA notification.
5 7 2	Annual Emissions Reports	C	The annual emissions report for 2003 will be submitted prior to May 1, 2004. The report demonstrated compliance with the annual permit emission limitations.
5 8	General operational flexibility/anticipated operating scenarios	C	Not applicable

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(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
5 9 1	General procedures for calculating emissions	C	The demonstration of compliance with the source-wide emission limits specified in Condition 5 5 is based on the reporting requirements of conditions 5 6 and 5.7, and compliance procedures in section 7 (unit specific conditions) of the CAAPP
6 1	Emission Reduction Market System (ERMS)	C	The facility is a participating source in the ERMS program and has maintained less than 15 tons of VOM during ERMS season. Appropriate records to document compliance with the ERMS requirements are maintained in file.
6.2	Emissions Reduction Marketing System (ERMS) – Applicability	C	The facility is participating source in the ERMS program. During the ERMS season, the facility shall not exceed 15 tons, not including VOM from insignificant units and activities as identified in Section 3 of this permit. This permit is exempt from requirements 35 IAC Part 205.
6 3	Recordkeeping for ERMS	C	The facility maintains copies of the following on file as its Compliance Master File: 1. Seasonal component of Annual Emission Report, 2. Information on Actual VOM emissions as specified in Sections 5 and 7 of the facility's CAAPP Permit. The facility shall submit the season emissions component by Oct. 31 st of each year.
	CAAPP SECTION 7 -- UNIT SPECIFIC CONDITIONS		
7 1 1	Paint Spray Booths	C	This section is a description that states the facility coats architectural woodwork in one of three paint spray booths. Coating operations include manual painting with brushes and rollers, paint mixing and thinning operations, and paint stripping and solvent cleaning operations. No compliance action is required.
7 1 2	List of emission units and air pollution control equipment	C	This section lists the paint spray booth equipment. The facility is adequately described in this section. No compliance action is required.
7 1 3(b)	Applicability Provisions – Particulates	C	Particulates emissions rates in any hour period shall not exceed 0.534 lbs. The facility uses engineering estimates to calculate particulate emissions generated by the paint spray booths.
7 1 3(c)	Wood Furniture topcoats	C	Topcoats must comply with lb VOM/lb Solids < 0.8. Using MSDSs and environmental datasheets provided by the coating supplier, the facility determines lb VOM/lb Solids by taking a ratio of VOM to Solids content of topcoats.

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(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
7 1 3(d)	Other wood furniture coating limitations	C	No owner of an affected paint spray booth shall apply at any time any coating in which the VOM content exceeds the following emission limitation for the coating as applied to wood furniture Using MSDSs and environmental datasheets provided by the coating supplier, the facility determines lbs VOM / Gallon for each coating
7 1 3(e)	Conditions Met Prior to Operation	C	Conditions 7 1 3(d) must be met in order to apply coating
7 1 4	Non-applicability of regulations of concern	C	No action is required for this section, since IEPA is simply stating that some regulators are not applicable
7 1 5(a)	Operational and production limits and work practices	C	Permittee shall operate, maintain, and replace the filters in a manner that assures compliance with conditions of this section and an adequate inventory of spare filters shall be maintained Filters are routinely inspected, and replaced by facility personnel, as required
7 1 6(a)-(c)	Emission Limitations	C	Emissions from three (3) spray booths shall not exceed specified limits for gallon usage and VOM The limits are stated in terms of gal/mo, gal/yr, lb/mo and tons/yr Compliance with the annual limits are determined on a monthly basis (running 2-month total)
7 1 7	Testing requirements	C	This section states that upon the request of the IEPA, VOM content of coatings and solvents can be tested for using USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and procedures of 35 IAC 218 105(a), no testing requested
7 1 8	Monitoring requirements	C	The facility visually inspects the filters and checks for air flow drop on a regular basis in order to ensure proper operation of the filters and need for replacement
7 1 9(a)	Record-keeping Requirements	C	Permittee currently maintains names, usage per month, usage per year, VOM weight per volume, HAP weight per volume, and VOM emission calculations for coating and cleaning solvent used at the facility
7 1 9(b)	Testing VOM and HAP content	C	Facility maintains records of any coating or cleaning solution testing of VOM and HAP content

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(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
7 1 9(c)	Spray Booth operating schedule	C	Facility maintains a daily operating schedule of the entire paint spray booth operation
7 1 9(d)	Filter Inspection	C	Facility maintains results of routine filter inspections and dates of filter replacement
7 1 10	Reporting requirements for deviations	C	In the event of a deviation of the affected coating operation with permit requirements, the facility will submit a report within 30 days for each deviation, and any corrective actions (or preventative measures) taken for excursions of conditions 7 1 3 For the period Jan. 1, 2003, until December 31, 2003, there were no deviations
7 1 11	Operational flexibility	C	Facility may utilize any coating, thinner, or cleaning solvent in any of the paint spray booths provided that the materials remain in compliance with the conditions of the permit
7 1 12	Compliance procedures	C	This section states the methodology for demonstrating compliance with various permit conditions
7 2 1	Description of Gluing Operation	C	Gluing operation includes assembly of woodwork components using manually applied adhesive This operation also includes emissions associated with cleaning solvents. No action required
7 2 2	List of Emission Units and Pollution Control Equipment	C	This section lists the glue spray booth equipment The facility is adequately described in this section No compliance action is required
7 2 3(b)	Applicability Provisions – Gluing	C	Organic emission rates in any hour period shall not exceed 8 0lbs The facility uses engineering estimates to calculate organic emissions generated by the gluing spray booth Organic emissions are estimated to be within permitted limitations
7 2 3(c)	Gluing Operation -Particulates	C	Particulates emissions rates in any hour period shall not exceed 0 534 lbs. The facility uses engineering estimates to calculate particulate emissions generated by the gluing spray booths Particulate emissions are estimated to be within permitted limitations

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Source I. D. Number	031198ABT

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7 2 4	Non-applicability of regulations of concern	C	No action is required for this section, since IEPA is simply stating that some regulators are not applicable
7 2 5	Control Requirements	C	None listed in Permit
7 2 6(a)	Emission Limitation - Glue Spray Booth Operation Equipment	C	Gluing operations have a limit of 200 gal/mo and 2,000gal/yr with VOM emissions of 1,200 lbs/mo and 6 0 tons/yr. Cleanup Solvent is limited to 50 gal/mo and 250 gal/yr with VOM limits of 400 lb/mo and 1 0 tons/yr. The facility is compliant with these usage limitations.
7 2 6(b)	Particulate Emissions from Gluing	C	Negligible emissions of particulate matter from glue spray booth.
7 2 7	Testing Requirements	C	None listed
7 2 8	Monitoring Requirements	C	None listed
7 2 9	Recordkeeping Requirements	C	Permittee currently maintains names, usage per month, usage per year, VOM weight per volume, HAP weight per volume, and VOM emission calculations for glue and cleanup solvent
7 2 10	Reporting Requirements	C	In the event of a deviation of the affected gluing operation with permit requirements, the facility will submit a report within 30 days for each deviation, and any corrective actions (or preventative measures) taken for excursions of conditions 7 2 3, and 7 2 6 For the period Jan 1, 2003, until December 31, 2003, there were no deviations
7 2 11	Operational Flexibility	C	N/A
7 2 12	Compliance Procedures	C	This section states the methodology for demonstrating compliance with various permit conditions No action required
7 3 1	Woodworking Operations Description	C	Woodworking operations consist of processing raw lumber and producing woodwork components Procedures include sanding, sawing, cutting, and grinding All operations are controlled by a cyclone and dust collector

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(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
7 3 2	List of Emission Units and Pollution Control Equipment	C	This section lists the woodworking and pollution control equipment. The facility is adequately described in this section. No compliance action is required.
7 3 3	Applicability of Woodworking Operation	C	Woodworking operation is subject to the emission limits identified in Condition 5 2 2.
7 3 4	Non-applicability of regulations of concern	C	No action is required for this section, since IEPA is simply stating that some regulations are not applicable.
7 3 5	Control Equipment	C	The Permittee shall operate, maintain, and replace the cyclone and dust collector in a manner that assures compliance with conditions of this section. Dust and cyclone filters are regularly inspected and a company log tracks the dates that filters are changed.
7 3 6	Emission Limitations	C	Negligible emissions of particulate matter from glue spray booth.
7 3 7	Operating Requirements	C	All unloading and transporting operations of materials collected by pollution control equipment shall be enclosed or shall utilize spraying, palletizing, or other methods pursuant to 35 IAC 212 307. The Permittee unloads particulates in an enclosed area.
7 3 8	Inspection Requirements	C	The facility visually inspects the cyclone and dust collector filters and checks for air flow drop on a regular basis in order to ensure proper operation of the filters and need for replacement.
7 3 9(a)	Recording Keeping Requirements	C	The Permittee monitors the flow rate and control efficiency of the cyclone and dust collecting filters by maintaining and inspecting the equipment on a regular basis.
7 3 9(b)	Recording Keeping Requirements	C	The Permittee maintains a dated log of maintenance and repairs to the cyclone and dust collecting filters onsite.
7 3 9(c)	Recording Keeping Requirements	C	The Permittee maintains a dated log of inspections and replacements to the cyclone and dust collecting filters onsite.

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(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
7 3 10	Reporting Requirements	C	In the event of a deviation of the affected woodworking operation with permit requirements, the facility will submit a report within 30 days for each deviation, and any corrective actions (or preventative measures) taken for excursions of conditions 7 2.3, and 7 2 6 (For the period Jan 1, 2003, until December 31, 2003, there were no deviations)
7 3 11	Operational Flexibility	C	N/A
7 3 12	Compliance Procedures	C	This section states the methodology for demonstrating compliance with various permit conditions.
8 1	Permit shield	C	No action required
8 2	Applicability of Title IV Acid Deposition	C	The facility agrees that, if regulations are promulgated under Title IV of the CAA that are inconsistent with the Title V requirements of this permit, the federal regulations shall take precedence
8 3	Emission trading programs	C	No action required
8 4 1	Operational flexibility/anticipated operating scenarios – changes specifically addressed by permit	C	No action required.
8 4 2	Changes requiring prior notification	C	The facility understands the provisions for changes to the permit, and will provide written notification at least 7 days prior to making a change as discussed in 8 4 2(e)
8 5	Testing procedures	C	The facility understands the document retention and data collection requirements for testing programs. No tests have been conducted in 2003 since the CAAPP permit was issued
8 6 1	Reporting requirements – monitoring reports	C	The semi-annual monitoring report for the monitoring required for the paint spray, gluing, and woodworking filter inspections for the period July-December, 2003 was submitted on February 25, 2004, which was prior to the March 1 due date. The report was certified as required by condition 9 9

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(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous Intermittent Noncompliance N/A	(4) Compliance Determination Method
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8 6 2	Test notifications	C	The facility will comply with the testing notification requirements of 8 6 2 when applicable. No testing was performed since the CAAPP permit was issued
8 6 3	Test reports	C	The facility will comply with the test report requirements, when applicable. No testing took place since the CAAPP permit was issued
8 6 4	Reporting addresses	C	No action required
8 7	Obligation to comply with Title I requirements	C	Informational statement No action required
9 1	Standard permit conditions - effect of permit	C	Informational statement No action required
9 2	General obligations – duty to comply	C	The facility is aware of the general obligations of the Permittee, including the Duty to Comply, Duty to Maintain Equipment, Duty to Cease Operation, Disposal Operations, and Duty to Pay Fees. The facility has complied with these provisions
9 3	Obligation to allow IEPA surveillance	C	The facility will comply with requirements for IEPA inspections
9 4	Obligation to comply with other requirements	C	The facility will comply with requirements of other applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control
9 5	Liability	C	The facility understands the liability provisions of the CAAPP permit as discussed in Section 9 5 1 to 9 5 5.
9 6	Recordkeeping	C	The facility understands the standard conditions related to control equipment maintenance records, records of changes in operation, and retention of records. The facility complies with these requirements.
9 7	Annual Emissions Report	C	The facility submitted the annual emissions report for calendar year 2002 on April 28, 2003, and will submit the annual emissions report for calendar year 2003 before the May 1, 2004 deadline

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Parenti & Raffaelli, Ltd.		031198ABT	
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
9.8	Requirements for compliance certification	C	The facility will submit annual compliance certifications no later than May 1 of the following year. Compliance certifications will also be submitted to USEPA Region V in Chicago.
9.9	Document submittal certification	C	Any documents, including reports, required to be submitted by this permit will contain certification by a responsible official.
9.10	Defense to enforcement actions	C	The facility has reviewed the defense to enforcement action provisions of this permit and will comply with the requirements, when applicable.
9.11	Permanent shutdown	C	Informational statement. No action required.
9.12.1 and 9.12.2	Reopening and reissuing permit for cause	C	The facility has reviewed the reopening and reissuing for cause section of the permit and will comply with the requirements, when applicable.
9.12.3	Inaccurate application	C	The facility is aware that the permit was issued based on information submitted in the CAAPP application, and that the permit may be subject to revocation under Section 39.5(15)(b) of the Act.
9.12.4	Duty to provide information	C	The facility will comply with the "Duty to Provide Information" condition of the permit.
9.13	Severability clause	C	The facility has reviewed the severability clause and understands the permit condition.
9.14	Permit expiration and renewal	C	The Permittee understands that the CAAPP permit renewal must be submitted no sooner than 12 months, and no later than 9 months, prior to permit expiration. The facility will continue to operate during the renewal period until final action is taken on the permit renewal.

Table 2. Deviation Summary Report

[illegible]